

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ROBERT L. THOMAS *et al.*
Plaintiffs,
Vs.

ADVERSARY No. 24-03066

ELIZABETH THOMAS *et al.*,
Defendants

AGREED TO MOTION FOR WITHDRAWAL OF COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Attorney James M. Andersen, and Elizabeth Thomas (the “Client”) and files this “Agreed To Motion for Withdrawal of Counsel” as the client has terminated the Attorney Employment Retainer Agreement and for cause shows the Court:

I.

1. In 2016, Counsel James M. Andersen was retained by Elizabeth Thomas to represent her in the cases styled as *Elizabeth Thomas vs. MTH Lending Group L.P. et al*, under case No. **2016-87941**, the case styled as *Elizabeth Thomas vs. Meritage Homes of Texas LLC, f/k/a/ Meritage Homes of Texas LP, Legacy Monterey Homes L.P.*, under case No. **2017-82388** and the case styled as *Miramar Lake Homeowners Association vs. Elizabeth Thomas* under case No. **2017-0408**, in the 333rd District Court, Harris County, Texas.

2. Attorney Colleen M. McClure is presently the sole counsel of record for Ms. Thomas in the case Styled as *Elizabeth Thomas vs. Primary Residential Mortgage Inc. et al.*, under case No. **2017-78078**, in the 333rd District Court, Harris County, Texas.

3. Ms. Thomas has terminated our employment contract in cases styled as *Elizabeth Thomas vs. MTH Lending Group L.P. et al*, under case No. ~~2016-8784~~, the case styled as *Elizabeth Thomas vs. Meritage Homes of Texas LLC, f/k/a/ Meritage Homes of Texas LP, Legacy Monterey Homes L.P.*, under case No. ~~2017-82388~~ and the case styled as *Miramar Lake Homeowners Association vs. Elizabeth Thomas* under case No. ~~2017-0408~~, in the 333rd District Court, Harris County, Texas.

4. Counsel and Elizabeth Thomas the client have agreed to filing of this motion of withdrawal of counsel. All records of pertaining to the above-mention cases have been turned over to Ms. Thomas. Ms. Thomas has notice that she is to appear in person on June 10, 2024, at 1:30 before this court. This motion to withdraw has to bearing on counsel's liability as to the pending compensation hearing wherein Ms. Thomas wishes to present herself.

5. Attorney James M. Andersen and Elizabeth Thomas pray that the Court enter an Order discharging counsel as the attorney of record for Elizabeth Thomas in this cause and that Ms. Thomas is proceeding pro se in this cause.

Respectfully submitted

JAMES M. ANDERSEN
ATTORNEY AT LAW

By: /s/James M. Andersen

James M. Andersen
Texas State Bar No.01165850
P. O. Box 58554
Webster, Texas 77598-8554
Tel. (281)488-2800
Fax. (281)480-4851
jandersen.law@gmail.com

.

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2024, , a true and correct copy of the foregoing instrument has been served by electronic transmission via the Court's CM/ECF system upon all parties designated as parties registered to receive electronic notice in this case

By:/s/James M. Andersen